

STATE OF SOUTH CAROLINA

BEFORE THE PUBLIC SERVICE COMMISSION

Docket No. 2022-159-E

In the Matter of:

Joint Application of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC for Approval of Make Ready Credit Program

PETITION TO INTERVENE OF CHARGEPOINT, INC.

ChargePoint, Inc. (“ChargePoint”), pursuant to SC Code of Laws § 58-41-20(A) and SC Code of Regs. 103-825, respectfully submits this petition to intervene in the above-captioned proceedings. In support of its petition, ChargePoint states:

1. On April 29, 2022, Duke Energy Carolinas, LLC and Duke Energy Progress, LLC (collectively, “Duke Energy”) filed a joint application for approval of a new Make Ready Credit (“MRC”) program and respective tariffs. The proposed MRC program is purportedly “designed to defray installation costs associated with [electric vehicle (‘EV’)] chargers” in order to encourage its customers to build “the infrastructure necessary to make a location ready for installation of Electric Vehicle Supply Equipment (‘EVSE’), including for Duke Energy’s new EVSE program proposed in Docket No. 2022-158-E. Duke Energy request approval of their application without notice or a hearing pursuant to S.C. Code Ann. § 58-27-870(F).

2. ChargePoint is a corporation organized pursuant to the laws of the State of Delaware with its corporate headquarters located at 254 East Hacienda, Ave. Campbell, CA 95008.

3. ChargePoint is a world-leading EV charging network, providing scalable solutions for every charging scenario from home and multifamily to workplace, parking, hospitality, retail, and transport fleets of all types. ChargePoint's cloud subscription platform and software-defined charging hardware are designed to enable businesses to support drivers, add the latest software features and expand fleet needs with minimal disruption to overall business.

4. ChargePoint's hardware offerings include Level 2 ("L2") and DC fast charging ("DCFC") products, and ChargePoint provides a range of options across those charging levels for specific use cases including light duty, medium duty, and transit fleets, multi-unit dwellings, residential (multi-family and single family), destination, workplace, and more. ChargePoint's software and cloud services enable EV charging station site hosts to manage charging onsite with features like Waitlist, access control, charging analytics, and real-time availability. With modular design to help minimize downtime and make maintenance and repair more seamless, all products are also UL-listed and CE ("EU") certified, and Level 2 solutions are ENERGY STAR® certified.

5. ChargePoint's primary business model consists of selling smart charging solutions directly to businesses and organizations while offering tools that empower station owners to deploy EV charging designed for their individual application and use case. ChargePoint provides charging network services and data-driven, cloud-enabled capabilities that enable site hosts to better manage their charging assets and optimize

services. For example, with those network capabilities, site hosts can view data on charging station utilization, frequency and duration of charging sessions, set access controls to the stations, and set pricing for charging services. These features are designed to maximize utilization and align the EV driver experience with the specific use case associated with the specific site host. Additionally, ChargePoint has designed its network to allow other parties, such as electric utilities, the ability to access charging data and conduct load management to enable efficient EV load integration onto the electric grid.

6. ChargePoint's current and future position and market presence within this State relates directly to the development of EV charging infrastructure in South Carolina and Duke Energy's proposed Make Ready Credit Program. ChargePoint has substantial and specific economic interests in the sustainable and scalable growth of EV charging infrastructure within South Carolina. ChargePoint currently sells EV charging equipment and services directly to consumers in South Carolina and has public charging ports in South Carolina. For those reasons, among others, ChargePoint's interests in this proceeding cannot be adequately represented or protected by any other party.

7. Duke Energy asserts that notice and hearing of its proposed new MRC Program and associated proposed tariffs are not required because "the Companies would seek to recover costs associated with this proposed Program in a future base rate case." While ChargePoint itself does not request a hearing in this proceeding, ChargePoint does respectfully request that, if intervention is granted, and if the Commission chooses to hold a hearing, that ChargePoint be allowed to fully participate in any such hearing. As such, ChargePoint hereby reserves the right to fully participate in any such hearing. ChargePoint's participation in this docket and any such hearing would constructively add

to the proceeding by contributing to the development of a complete record based on ChargePoint's unique and substantial business interest in developing EV charging infrastructure at competitive market rates in South Carolina.

8. Granting ChargePoint's request to intervene in this proceeding is in the public interest and is consistent with the policies of the Commission in encouraging maximum public participation in issues before it.

9. Pursuant to Rule 103-804, ChargePoint states that it is represented by the following counsel in this proceeding:

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WHEREFORE, Petitioner ChargePoint, Inc. prays that it be allowed to intervene as a party of record and participate fully in this proceeding, including any hearing on the proposals set forth in the joint application.

Respectfully submitted, this 3rd day of May, 2022.

By: /s/ Weston Adams, III

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CERTIFICATE OF SERVICE

This is to certify that I have caused to be served this day one copy of the **Petition to Intervene of ChargePoint, Inc.** to the persons named below at the addresses set forth via electronic mail and e-filing:

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/s/ Weston Adams, III
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Columbia, South Carolina
May 3, 2022